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ex rel. its Department of Transportation
9

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 MONIKA SMITH,

13 Plaintiff,

14 vs.

15 STATE OF NEVADA ex rel its DEPARTMENT
OF TRANSPORTATION,

16 Defendant.
17

Case No. 2:18-cv-00640-JAD-GWF

**STIPULATION AND ORDER
EXTENDING DEADLINE TO FILE
DISPOSITIVE MOTIONS
(SECOND REQUEST)**

18 Pursuant to Local Rules IA 6-1, IA 6-2, and 26-4, Plaintiff Monika Smith and Defendant State
19 of Nevada, ex rel. its Department of Transportation (NDOT) by and through their respective attorneys,
20 hereby stipulate and agree to extend the dispositive motions deadline currently set for Thursday,
21 February 28, 2019, to March 15, 2019. This is the parties' second stipulation for extension of time
22 with respect to the dispositive motions deadline and also the second stipulation for extension of time
23 overall in this case (the original dispositive motions deadline was Tuesday February 12, 2019, but was
24 extended to Thursday, February 28, 2019, after Plaintiff's deposition was rescheduled from January
25 10, 2019, but was moved to January 30, 2019, pursuant to NDOT's request).

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1 This request for extension is not brought about to cause undue delay. Good cause exists for the
2 extension due to primary defense counsel's current litigation and administrative schedule. Primary
3 counsel for NDOT handles all of NDOT's personnel-related litigation, administrative and day-to-day
4 counsel statewide and is diligently working on the summary judgment motion, but is in need of
5 additional time to properly research and analyze the issues in this case and finalize the summary
6 judgment motion. Additionally, secondary defense counsel is assisting in drafting the summary
7 judgment motion, but is scheduled out of the office February 22 until February 26, 2019. The fifteen-
8 day extension of dispositive motion deadline is to allow sufficient time for drafting the dispositive
9 motions.

10 RESPECTFULLY SUBMITTED this 20th day of February 2019.

11 AARON D. FORD
12 Attorney General

LIZADA LAW FIRM

13 By: /s/ Dominika J. Batten
14 DOMINIKA J. BATTEN (Bar. No. 12258)
15 Deputy Attorney General
16 Attorneys for Defendant

/s/ Angela J. Lizada
ANGELA J. LIZADA (Bar No. 11637)
Attorney for Plaintiff

17 **ORDER**

18 **IT IS SO ORDERED.**

19 
20 UNITED STATES MAGISTRATE JUDGE

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22 DATED: 2/21/2019